

RECEIVED

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

JUN 20 2008  
Sun 20 2008  
MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

MS. VICTORIA JONES  
P.O. BOX 2658  
COUNTRY CLUB HILLS, IL. 60478  
(Name of the plaintiff or plaintiffs)  
v.  
BREMEN HIGH SCHOOL DISTRICT 228  
15203 S. PULASKI  
MIDLOTHIAN, IL. 60445  
(Name of the defendant or defendants)

CIVIL ACTION

08CV3548  
JUDGE MANNING  
MAG. JUDGE KEYS

COMPLAINT OF EMPLOYMENT DISCRIMINATION

1. This is an action for employment discrimination.
2. The plaintiff is VICTORIA JONES of the  
county of COOK in the state of ILLINOIS.
3. The defendant is BREMEN HIGH SCHOOL DISTRICT 228, whose  
street address is 15203 S. PULASKI  
(city) MIDLOTHIAN (county) COOK (state) ILLINOIS (ZIP) 60445  
(Defendant's telephone number) (708) - 389-1175
4. The plaintiff sought employment or was employed by the defendant at (street address)  
15203 SOUTH PULASKI (city) MIDLOTHIAN  
(county) COOK (state) ILLINOIS (ZIP code) 60445
5. The plaintiff [check one box]
  - (a) ☐ was denied employment by the defendant.
  - (b) ☒ was hired and is still employed by the defendant.
  - (c) ☐ was employed but is no longer employed by the defendant.

6. The defendant discriminated against the plaintiff on or about, or beginning on or about, (month) DECEMBER, (day) 01, (year) 2005.

7.1 (Choose paragraph 7.1 or 7.2, do not complete both.)

(a) The defendant is not a federal governmental agency, and the plaintiff [check one box] ☐ has ~~not~~ ☒ has filed a charge or charges against the defendant asserting the acts of discrimination indicated in this complaint with any of the following government agencies:

(i) ☐ the United States Equal Employment Opportunity Commission, on or about (month) OCTOBER (day) 05 (year) 2007.

(ii) ☐ the Illinois Department of Human Rights, on or about (month) NOVEMBER (day) 29 (year) 2007.

(b) If charges were filed with an agency indicated above, a copy of the charge is attached. ☒ YES. ☐ NO, but plaintiff will file a copy of the charge within 14 days.

It is the policy of both the Equal Employment Opportunity Commission and the Illinois Department of Human Rights to cross-file with the other agency all charges received. The plaintiff has no reason to believe that this policy was not followed in this case.

7.2 The defendant is a federal governmental agency, and

(a) the plaintiff previously filed a Complaint of Employment Discrimination with the defendant asserting the acts of discrimination indicated in this court complaint.

☐ Yes (month) \_\_\_\_\_ (day) \_\_\_\_\_ (year) \_\_\_\_\_

☒ No, did not file Complaint of Employment Discrimination

2. The plaintiff received a Final Agency Decision on (month) APRIL (day) 10 (year) 2008.

c. Attached is a copy of the

a. Complaint of Employment Discrimination,

☒ YES ☐ NO, but a copy will be filed within 14 days.

(ii) Final Agency Decision

☒ YES ☐ NO, but a copy will be filed within 14 days.

8. *(Complete paragraph 8 only if defendant is not a federal governmental agency.)*
- (a) ☐ the United States Equal Employment Opportunity Commission has not issued a *Notice of Right to Sue*.
- (b) ☒ the United States Equal Employment Opportunity Commission has issued a *Notice of Right to Sue*, which was received by the plaintiff on (month) APRIL (day) 13 (year) 08 a copy of which *Notice* is attached to this complaint.
9. The defendant discriminated against the plaintiff because of the plaintiff's *[check only those that apply]*:
- (a) ☐ Age (Age Discrimination Employment Act).
- (b) ☒ Color (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
- (c) ☐ Disability (Americans with Disabilities Act or Rehabilitation Act)
- (d) ☒ National Origin (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
- (e) ☒ Race (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
- (f) ☐ Religion (Title VII of the Civil Rights Act of 1964)
- (g) ☒ Sex (Title VII of the Civil Rights Act of 1964)
10. If the defendant is a state, county, municipal (city, town or village) or other local governmental agency, plaintiff further alleges discrimination on the basis of race, color, or national origin (42 U.S.C. § 1983).
11. Jurisdiction over the statutory violation alleged is conferred as follows: for Title VII claims by 28 U.S.C. §1331, 28 U.S.C. §1343(a)(3), and 42 U.S.C. §2000e-5(f)(3); for 42 U.S.C. §1981 and §1983 by 42 U.S.C. §1988; for the A.D.E.A. by 42 U.S.C. §12117; for the Rehabilitation Act, 29 U.S.C. § 791.
12. The defendant *[check only those that apply]*
- (a) ☐ failed to hire the plaintiff.
- (b) ☐ terminated the plaintiff's employment.
- (c) ☐ failed to promote the plaintiff.

- (d) ☐ failed to reasonably accommodate the plaintiff's religion.
- (e) ☐ failed to reasonably accommodate the plaintiff's disabilities.
- (f) ☒ failed to stop harassment;
- (g) ☒ retaliated against the plaintiff because the plaintiff did something to assert rights protected by the laws identified in paragraphs 9 and 10 above;
- (h) ☐ other (specify): SUPPORTING DOCUMENTATION OF HARASSMENT AND RETLIATION ATTACHED

13. The facts supporting the plaintiff's claim of discrimination are as follows:

SUPPORTING DOCUMENTATION ATTACHED

14. **[AGE DISCRIMINATION ONLY]** Defendant knowingly, intentionally, and willfully discriminated against the plaintiff.

15. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

16. **THEREFORE**, the plaintiff asks that the court grant the following relief to the plaintiff  
[check only those that apply]

- (a) ☐ Direct the defendant to hire the plaintiff.
- (b) ☐ Direct the defendant to re-employ the plaintiff.
- (c) ☐ Direct the defendant to promote the plaintiff.
- (d) ☐ Direct the defendant to reasonably accommodate the plaintiff's religion.
- (e) ☐ Direct the defendant to reasonably accommodate the plaintiff's disabilities.

(f) ☐ Direct the defendant to (specify): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(g) ☒ If available, grant the plaintiff appropriate injunctive relief, lost wages, liquidated/double damages, front pay, compensatory damages, punitive damages, prejudgment interest, post-judgment interest, and costs, including reasonable attorney fees and expert witness fees.

(h) ☐ Grant such other relief as the Court may find appropriate.

(Plaintiff's signature)

(Plaintiff's name)

(Plaintiff's street address)

P.O. Box 2658

(City) COUNTRY CLUB HILL (State) ILLINOIS (ZIP) 60478

(Plaintiff's telephone number) (708) - 846-1777

Date: JUNE 20, 2008



U.S. Department of Justice

Civil Rights Division

NOTICE OF RIGHT TO SUE  
WITHIN 90 DAYS

CERTIFIED MAIL  
5054 1064

950 Pennsylvania Avenue, N.W.  
Karen Ferguson, EMP, PHB, Room 4219  
Washington, DC 20530

Ms. Victoria Jones  
P.O. Box 2658  
Country Club Hills, IL 60478

April 10, 2008

Re: EEOC Charge Against Breman High School Dist. #228  
No. 440200800161

Dear Ms. Jones:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title I of the Americans with Disabilities Act of 1990, 42 U.S.C. 12111, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice. If you cannot afford or are unable to retain an attorney to represent you, the Court may, at its discretion, assist you in obtaining an attorney. If you plan to ask the Court to help you find an attorney, you must make this request of the Court in the form and manner it requires. Your request to the Court should be made well before the end of the time period mentioned above. A request for representation does not relieve you of the obligation to file suit within this 90-day period.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

Grace Chung Becker  
Acting Assistant Attorney General  
Civil Rights Division

by

Karen L. Ferguson  
Supervisory Civil Rights Analyst  
Employment Litigation Section

cc: Chicago District Office, EEOC  
Breman High School Dist. #228

EEOC Form 5 (5/01)

**CHARGE OF DISCRIMINATION**

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To:

Agency(ies) Charge No(s):

☐ FEPA☒ EEOC

440-2008-00161

**Illinois Department Of Human Rights**

and EEOC

State or local Agency, if any

Home Phone (Incl. Area Code)

Date of Birth

Name (Indicate Mr., Ms., Mrs.)

(708) 846-1777

11-29-1959

Ms. Victoria Jones

Street Address

City, State and ZIP Code

P O Box 2658, Country Club Hills, IL 60478

Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)

Name

No. Employees, Members

Phone No. (Include Area Code)

BREMEN HIGH SCHOOL DISTRICT 228

500 or More

(708) 371-3600

Street Address

City, State and ZIP Code

15203 South Pulaski Road, Midlothian, IL 60445

Name

No. Employees, Members

Phone No. (Include Area Code)

Street Address

City, State and ZIP Code

DISCRIMINATION BASED ON (Check appropriate box(es).)

DATE(S) DISCRIMINATION TOOK PLACE

Earliest

Latest

☒ RACE ☐ COLOR ☐ SEX ☐ RELIGION ☐ NATIONAL ORIGIN  
☐ RETALIATION ☐ AGE ☐ DISABILITY ☒ OTHER (Specify below.)

12-01-2005

10-05-2007

☒ CONTINUING ACTION

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)).

I have been employed by Respondent since May 1984 as a Secretary. Beginning in or about December 2005, and continuing, I have been subjected to harassment which has created a hostile work environment.

I believe that I have been discriminated against because of my race, Black, in violation of Title VII of the Civil Rights Act of 1964, as amended.

**RECEIVED EEOC**

OCT 05 2007

**CHICAGO DISTRICT OFC**

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

NOTARY - When necessary for State and Local Agency Requirements

I declare under penalty of perjury that the above is true and correct.

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.  
 SIGNATURE OF COMPLAINANT

Oct 05, 2007

Date

Charging Party Signature

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE  
 (month, day, year)

EEOC Form 5 (5/01)

**CHARGE OF DISCRIMINATION**

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To: Agency(ies) Charge No(s):

☐ FEPA  
☒ EEOC**AMENDED**  
**440-2008-00161****Illinois Department Of Human Rights**

and EEOC

State or local Agency, if any

Name (Indicate Mr., Ms., Mrs.)

**Ms. Victoria Jones**

Home Phone (Incl. Area Code)

**(708) 846-1777**

Date of Birth

**11-29-1959**

Street Address

City, State and ZIP Code

**P O Box 2658, Country Club Hills, IL 60478**

Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)

Name

**BREMAN HIGH SCHOOL DISTRICT 228**

No. Employees, Members

**500 or More**

Phone No. (Include Area Code)

**(708) 371-3600**

Street Address

City, State and ZIP Code

**15203 South Pulaski Road, Midlothian, IL 60445**

Name

No. Employees, Members

Phone No. (Include Area Code)

Street Address

City, State and ZIP Code

DISCRIMINATION BASED ON (Check appropriate box(es).)

☒ RACE ☐ COLOR ☐ SEX ☐ RELIGION ☐ NATIONAL ORIGIN  
☐ RETALIATION ☐ AGE ☒ DISABILITY ☐ OTHER (Specify below.)

DATE(S) DISCRIMINATION TOOK PLACE

Earliest

Latest

**12-01-2005****10-05-2007**☒ CONTINUING ACTION

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

I have been employed by Respondent since May 1984 as a Secretary. Respondent has been aware of my disability. Beginning in or about December 2005, and continuing, I have been subjected to harassment which has created a hostile work environment.

I believe that I have been discriminated against because of my race, Black, in violation of Title VII of the Civil Rights Act of 1964, as amended. I also believe I have been discriminated against because of my disability, in violation of the Americans with Disabilities Act of 1990.

**RECEIVED EEOC****DEC 21 2007****CHICAGO DISTRICT OFFICE**

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

NOTARY - When necessary for State and Local Agency Requirements

I declare under penalty of perjury that the above is true and correct.

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE  
(month, day, year)

Date

Charging Party Signature



**CHARGE OF DISCRIMINATION**

This form is affected by the Privacy Act of 1974: See Privacy act statement before completing this form.

#08W1128-16

**AGENCY**☒ IDHR☐ EEOC**CHARGE NUMBER**

2008CF1357

**Illinois Department of Human Rights and EEOC**

NAME (indicate Mr, Ms, Mrs.)

Ms. Victoria Jones

HOME TELEPHONE (include area code)

(708) 846-1777

STREET ADDRESS

P.O. Box 2658

CITY, STATE AND ZIP CODE

Country Club Hills, Illinois 60478

DATE OF BIRTH

11/29/59

NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (IF MORE THAN ONE LIST BELOW)

NAME

School District #228 - Bremen

NUMBER OF EMPLOYEES,  
MEMBERS 15+

TELEPHONE (Include area code)

(708) 389-1175

STREET ADDRESS

15203 S Pulaski Road

CITY, STATE AND ZIP CODE

Midlothian, Illinois 60478

COUNTY

Cook (031)

CAUSE OF DISCRIMINATION BASED ON:

Race Mental Disability Retaliation

DATE OF DISCRIMINATION

EARLIEST (ADEA/EPA) LATEST (ALL)

10/06/07

☐ CONTINUING ACTION

THE PARTICULARS ARE (if additional space is needed attach extra sheets)

**I. A. ISSUE/BASIS****HARASSMENT, BEGINNING ON /OR ABOUT OCTOBER 6, 2007 AND CONTINUING THROUGH OCTOBER 16, 2007, BECAUSE OF MY RACE, BLACK.****B. PRIMA FACIE ALLEGATIONS**

1. My race is black.

2. I have satisfactorily performed my duties as a Secretary in Respondent's P.P.S Department, and have been employed with Respondent since June, 1984.

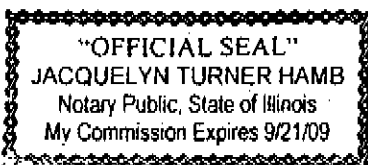
(Continued)

I also want this charge filed with the EEOC. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

SUBSCRIBED AND SWORN TO BEFORE

ME THIS 29 DAY OF November, 2007

NOTARY SIGNATURE



NOTARY SEAL

X S. Turner 11/29/07  
SIGNATURE OF COMPLAINANT DATE

I declare under penalty that the foregoing is true and correct I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief

**CHARGE OF DISCRIMINATION**

This form is affected by the Privacy Act of 1974; See Privacy Act Statement before completing this form.

AGENCY

☒ FEPA  
☐ EEOC

CHARGE NUMBER

1994CF0988

**STATE OF ILLINOIS DEPARTMENT OF HUMAN RIGHTS/Intake and EEOC**  
State or local Agency, if any

NAME (Indicate Mr., Ms., Mrs.)

Victoria Jones

HOME TELEPHONE (Include Area Code)

708-371-0393

STREET ADDRESS

3207 Emory Lane

CITY, STATE AND ZIP CODE

Robbins, IL 60472

DATE OF BIRTH

NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (If more than one list below.)

NAME DISTRICT 228 Bremen Township

NUMBER OF EMPLOYEES, MEMBERS

TELEPHONE (Include Area Code)

Board of Education

708-371-3600

STREET ADDRESS

15203 S. Pulaski

CITY, STATE AND ZIP CODE

Midlothian, IL 60445

COUNTY Cook

NAME

TELEPHONE NUMBER (Include Area Code)

STREET ADDRESS

CITY, STATE AND ZIP CODE

COUNTY

CAUSE OF DISCRIMINATION BASED ON (Check appropriate box(es))

☒ RACE ☐ COLOR ☐ SEX ☐ RELIGION ☐ NATIONAL ORIGIN  
☐ RETALIATION ☐ AGE ☐ DISABILITY ☐ OTHER (Specify)DATE DISCRIMINATION TOOK PLACE  
EARLIEST LATEST

9/9/93

☐ CONTINUING ACTION

THE PARTICULARS ARE (If additional space is needed, attach extra sheet(s))

I. On September 9, 1993, I was denied promotion to the position of secretary to the Director of Facilities and Services. I was hired on June 5, 1984 and currently function as dean secretary.

II. According to Richard Linden (white), Director of Facilities and services, I was denied the position because it was given to someone who is more qualified than I am.

III. I believe I have been discriminated against because of my race, black, in that:

A. I am a good and conscientious employee.

B. The individual who was promoted to that position, Kathy McAteer (white), is not as qualified or experienced as I am. In fact I have played a significant role in the process of training her since she has been employed at Respondent.

CAH/kir

☒ I want this charge filed with both the EEOC and the State or NOTARY (When necessary for State and local Agency, if any. I will advise the agencies if I change my address or telephone number and cooperate fully with them in the processing of my charge in accordance with their procedures.)

I declare under penalty of perjury that the foregoing is true and correct.

SIGNATURE

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE  
(Day, month, and year)

NOTARY PUBLIC SEAL

"OFFICIAL SEAL"  
Krystal L. RogersNotary Public, State of Illinois  
My Commission Expires Nov. 7, 1994

[www.GoldmanEhrlich.com](http://www.GoldmanEhrlich.com)

-----Original Message-----

**From:** RICHARD MITCHELL [mailto:rmit404@sbcglobal.net]

**Sent:** Tuesday, March 11, 2008 1:20 PM

**To:** Arthur Ehrlich

**Subject:** Re: Victoria Jones/Bremen

I'm in Puebla, Mexico, so we'd have to search for a beach! ;)

I think if you look across the district and who is in charge administratively you can see a distinct pattern of promoting whites into positions of power, and then using them to beat up on minorities whenever possible. It's so pervasive that I don't know where to begin to help you, Art. Otis Lane, black dean at Bremen, complained to me early on that he was the victim of racial discrimination at Bremen. He might be a good person to connect with. He was passed over for a principal position at Hillcrest this past year. He also indicated that black kids were discriminated against at Bremen. Whether or not you'd get any help out of him now or not, I don't know. The district has a way of "quieting" people who make noise. But just look at who is in charge of the buildings....with the exception of Hillcrest....they're all white. Bremen doesn't have a single black administrator (except for the one dean, which isn't a full admin position)--or Hispanic, for that matter, which would make more sense since its largest minority is now hispanic. Cynthia Walker was on the board for years and she constantly indicated that racial discrimination was a problem for her and her kids while attending Hillcrest and Tinley Park. Again, I don't know if she'd be willing to assist you. She's no longer on the board. I was just deposed in december by the parent of a black student at Oak Forest who alleged racial discrimination...Chori bryant. I, of course, allege I was released because I'm gay...which we're in the middle of now. Another psychologist at Bremen, who is lesbian, was placed on permanent leave after being harrassed for a full year or more by the administration at Bremen. Her name is Betsy Molnar. There is definitely a problem at Bremen, and it is mostly due to a southside mentality of discrimination. I put a sign up on the marquis when I first got back to the district saying, in Spanish, "Welcome back to School." A board member called me to take it down immediately. That's what you're up against.

If I think of other specific things, I'll let you know. I've been trying to forget 228.

Good luck....Rich

Previous  
Superintendent  
2006-07  
School year

----- Original Message -----

From: Arthur Ehrlich <Arthur@goldmanehrllich.com>  
To: RICHARD MITCHELL <rmit404@sbcglobal.net>  
Sent: Tuesday, March 11, 2008 12:51:40 PM  
Subject: RE: Victoria Jones/Bremen

Wish I could be there in person in Mexico to ask questions as we chat by the beach.

Anyway, as you may know, Ms. Jones is alleging race discrimination in the way she has been picked on, singled out, and held to higher standards. She has told me that as the prior Superintendent, you may have some knowledge of a pattern of racial discrimination in the Deans' office where she worked. If so, any information you have on this may help. It could be your knowledge of complaints of discrimination against the same Deans in Ms. Jones' office made by other black employees or even by parents or students who have felt they were treated differently than white students.

You may have witnessed or heard of how these deans have treated other black employees/students differently. Anything along these lines would be helpful.

Ms. Jones can identify the key personnel causing her problems.  
Thanks for your help

Arthur R Ehrlich  
Goldman and Ehrlich  
19 South La Salle Street  
Suite 1500  
Chicago, IL 60603  
(312) 332-6733  
(312) 332-4629 fax  
Arthur@GoldmanEhrlich.com  
www.GoldmanEhrlich.com

-----Original Message-----

**From:** RICHARD MITCHELL [mailto:rmit404@sbcglobal.net]  
**Sent:** Tuesday, March 11, 2008 12:28 PM  
**To:** Arthur Ehrlich  
**Subject:** Victoria Jones/Bremen

Arthur--

I got an email from Vickie Jones asking me to contact you.  
My name is Rich Mitchell and I was the supt. at 228 for a short time, which is where I met Vickie. If I can be of help to you, this is the best way to communicate, as I'm spending time in Mexico until May. Look forward to hearing from you.

Rich Mitchell

Previous Superintendent / 06-07  
School Dist 228 School year

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Be a better friend, newshound, and know-it-all with Yahoo! Mobile. [Try it now.](#)

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**Fw: Re: FW: Victoria Jones/Bremen**

Tuesday, June 10, 2008 8:35 PM

**From:** "victoria jones" <simone\_60478@yahoo.com>  
**To:** simone\_60478@yahoo.com

— On Tue, 6/10/08, victoria jones <simone\_60478@yahoo.com> wrote:

From: victoria jones <simone\_60478@yahoo.com>  
Subject: Fw: Re: FW: Victoria Jones/Bremen  
To: simone\_60478@yahoo.com  
Date: Tuesday, June 10, 2008, 8:33 PM

— On Sat, 4/26/08, victoria jones <simone\_60478@yahoo.com> wrote:

From: victoria jones <simone\_60478@yahoo.com>  
Subject: Fw: Re: FW: Victoria Jones/Bremen  
To: simone\_60478@yahoo.com  
Date: Saturday, April 26, 2008, 4:01 PM

— On Tue, 3/11/08, victoria jones <simone\_60478@yahoo.com> wrote:

From: victoria jones <simone\_60478@yahoo.com>  
Subject: Re: FW: Victoria Jones/Bremen  
To: "Arthur Ehrlich" <Arthur@goldmanehrllich.com>  
Date: Tuesday, March 11, 2008, 4:26 PM

Otis Lane is the 3rd Dean at Bremen who I worked with the longest, he gave me my 06/07 evaluation. I will call him after he get out of work, but He is one of the Dean in that office and he sees what is going on to. I will e-mail you soon with more infor.

Thank so much  
Ms. Jones

**Arthur Ehrlich <Arthur@goldmanehrllich.com> wrote:**

This is the response I got from Dr Mitchell. I was wondering if you had anything to add, including if Otis Lane might be of help

Arthur R Ehrlich  
Goldman and Ehrlich  
19 South La Salle Street  
Suite 1500  
Chicago, IL 60603  
(312) 332-6733  
(312) 332-4629 fax  
Arthur@GoldmanEhrlich.com

The End  
↓

**Victoria Jones**

---

**From:** Victoria Jones  
**Sent:** Thursday, September 27, 2007 9:02 AM  
**To:** Dave Kibelkis  
**Cc:** Edwin Lipowski; Vicki Intoe; Victoria Jones  
**Subject:** Concern 3  
**Attachments:** Concerns.doc

Dear Dr. Kibelkis

Attached you will find a letter that I submitted to Dr. Mendenhall, as a result, I met with Dr. Mendenhall and Ms. Jurgens regarding Ms. Jurgens actions toward me. However this meeting did not cause Ms. Jurgens to stop harassing me.

There have been four or five meeting with Mr. Lipowski relative to Ms. Jurgens action toward me. during one of those meeting, Ms. Jurgens admitted acting inappropriately toward me in front of Parents and students. These actions by Ms. Jurgens have created a hostile work environment and continue to cause me work related stress.

I am appealing to you to intervene in this situation.

Thanks  
Ms. Jones

6/18/2008

**Marcia Mendenhall**

---

**From:** Michele Jurgens  
**Sent:** Tuesday, April 04, 2006 8:45 AM  
**To:** Marcia Mendenhall  
**Subject:** FW: Concerns

-----Original Message-----

**From:** Victoria Jones  
**Sent:** Friday, March 24, 2006 9:57 AM  
**To:** Marcia Mendenhall  
**Cc:** Phyllis A. Kimmel; Otis Lane; Vince Kasley; Michele Jurgens  
**Subject:** Concerns

Dear Dr. Mendenhall,

I have been a discipline secretary for over 20 years, I have been assigned more jobs than any discipline secretary in the district, I handled bus routes, assigned appropriate busses for students, lockers, as well as putting this information in the computer, for students I.D.s, I process all Dean Referrals, Detentions, M.D.P. S. Suspension, Saturday Detention, As well as filing all these forms in the students file, mailing parents informing them of this disposition. Send trespassing letter, Home coming request forms???? Parking applications, Record Monthly & Yearly suspension report. I answer the telephone for all the deans, bus complaints, theft, locker complaints, etc.... greet visitor entering the P.P.S. office as well as supervised any students who need to be discipline.

I must deal with them if they are rude or cordial and frequently calm them to restore a business like atmosphere in the office, I have done all of the above described with a smile and without complaint or permission. I have given up my morning break to accomplish tasks in the office. When the attendance secretary is away, I adapt to this situation and complete her job.

Now it seems to me that I don't get any complaint from Students, Teachers, Administration, Past Administration, as well as Parents, who praise me for my service to them. My job is done on time as well as my reports, at what point did my recognition diminish, because all I been getting is complaint from Ms. Jurgens.

In an effort to understand what is going on the P.P.S. office I believe that over the past 20 years as the Deans secretary I have not heard that many complaints from Parents, Students, Administration, Past and Present as to a lack of my response to them, I received a number of commendations for my service from them known and unknown to many who praise me for what I do, However lately I believe my recognition from some have diminish and the complaints by Ms. Jurgens have been numerous and leads me to believe that they are of a personal nature based on a mutual respect for what do. Over the past I have respected the Deans and protected the Deans from a lot of unnecessary things that occur in the office, that prevent them from having to deal with it, Dr Mendenhall this



current situation has cause me just as must stress as it has cause everyone  
else. I need some answers.

*Thanks*

*Victoria Jones*

*Bremen High School*

*Deans Assistant*

*ext. 2208*

Arthur Ehrlich, Attorney at Law  
19 South LaSalle Street  
15<sup>th</sup> Floor  
Chicago, IL 60603  
March 19, 2008

I was employed with Bremen High School District 228 from August 2005 until May 2007 as the Pupil Personnel Services Coordinator at Bremen High School. In that capacity, my responsibilities included the overall coordination and supervision of the daily functions of the pupil personnel services department which included discipline, guidance and counseling and ancillary services.

While serving in this capacity, Ms. Michele Jurgens, a dean, made numerous complaints about the performance of Ms. Victoria Jones, a clerical worker. Ms. Jones also serves as the Dean's Secretary. Numerous meetings were held with both of them to resolve the issues. Ms. Michele Jurgens continued to send numerous e-mails to me about Ms. Jones's performance through the end of the last school year of which I served at Bremen High School.

I witnessed Ms. Jurgens slam a handful of papers down on the counter in front of Ms. Jones's desk on one occasion. I was standing in the doorway of my office at this time. Ms. Jurgens may not have been aware that I had witnessed this incident. I brought this to the attention of my supervisor, Dr. Mendenhall. To my knowledge, she did not respond to this.

I met with Ms. Jones and Ms. Jurgens when Ms. Jurgens made complaints to try to resolve the issues. In my opinion, the issues were resolved through compromise, although Ms. Jurgens continued to e-mail complaints about Ms. Jones's performance to me. These incidents of the e-mails and the paper slamming created a hostile working environment. I tried to do as much as I could given the limits placed upon me by meeting with the two employees each time a complaint was made.

Please feel free to contact me should you need additional information. You may contact me at 815-531-4245.

Sincerely,

  
Phyllis A. Kimmel

May 16, 2007  
2:33 pm

I was standing at the desk of Karen Edwards, attendance secretary, waiting for another secretary to return to the P.P.S. office to begin a meeting. Mr. Paul Rybarczyk, associate principal, approached me and asked if he could speak with me in my office, but before I could take a step toward my office, he rudely said to Ms. Edwards, "Is that all you can do is read a magazine? You can't even take a message from a parent?" He then looked over toward Victoria Jones and said, "Can't you take a message, either?" At that point, I said, "Let's go back to my office and discuss this." Karen asked him, "What are you talking about? I am on my break." He then turned and exited the P.P.S. office area. There were students present when this incident occurred.

Phyllis Kimmel  
Pupil Personnel Service Coordinator  
Bremen High School  
2005 - 2006  
2006 - 2007  
School Years



## Karen Edward Statement Co-Worker

On May 16, 2007 Around 2:15/2:30pm,  
Mr. Paul Rybarczyk, Associate  
Principal at Bremer H.S. stormed  
into the P.P.S. office asking for  
Phyllis Kimmel, PPS Director.  
He stood by my desk (Mrs. Edwards).  
I was taking my break and  
looking through a catalog  
while waiting for our secretary's  
meeting w/ Mrs. Kimmel to begin.  
Mr. Rybarczyk looked at me and  
stated: "That's all you can do  
all day is sit there & read a  
magazine" I was totally surprised  
and looked up at him and said  
"pardon me?" He repeated: "Is that  
all you can do all day is sit  
there and read a magazine but  
you can't take a message from  
a parent?" I asked him what  
was he talking about because I  
had no idea what was going on.  
He would not specify what he was  
referring to but kept ranting  
raising in front of several students.

(2)

Karen Edward Statement - Co-Worker  
that were in the of fire and  
parents also who were there  
at the time. & co-~~workers~~ workers  
Our PPS Director tried to  
calm him down but he wouldn't  
stop. He then waved his hand  
at Ms. Jones and said "And  
her over there can't do anything  
either." Ms. Kimmel finally  
got him to go into her office.  
It was very humiliating and  
embarrassing.

Ms. Edwards  
Attendance Secretary

## KAREN EDWARD Statement

Co-Worker

On Friday 10/12/07 around about 2:30/3:40 pm Mr. Cipowski, PPS Director went over to Mr. Jones, Jean's Assistant's desk and asked her why she did not have the Bus report that was given to her on Wednesday 10/10/07 finished. She began ~~to~~ to explain why. He then wanted her to show him how long it take to run the report & then he wanted her to show him what it is that she does all day. He began to get loud & confrontational to the point where I wanted to ask him if he would take that discussion into his office.

Ms Edwards  
Attendance Secretary



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eh J. Valshtay, M.D.

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anine Connolly, M.D.

**UROLOGY**

en M. Pierpaoli, M.D.

ines A. Sylora, M.D.

**EXECUTIVE OFFICER**

David G. Seaman

January 30, 2008

RE: Victoria Jones  
901760100  
DOB: 11/29/1959

To Whom It May Concern:

Victoria Jones is a 48-year-old African-American female who has been seeing me since after 8/2007, very stressed at work, high blood pressure at work. Also complaining of right hand numbness and tingling sensation. She has been on the computer for many years. In between the patient was also admitted to the hospital for anxiety and palpitation and uncontrolled hypertension. At the present time she is undergoing treatment. She is on multiple medications, DynaCirc for the blood pressure, Ambien for the sleep, Synthroid, and Ativan. She is also going through the carpal tunnel syndrome treatment and physical therapy at the PTSIR rehabilitation.

Patient has been off work since 10/15/07. Her hypertension, anxiety and the carpal tunnel are caused from the work situation.

Sincerely,

Ashok Dholakia, MD/sdp

D: 01/30/08

T: 01/31/08

J: 2009



## **The Center for Neurobehavioral Services, S.C.**

*Neuropsychology Division*

*Phone: 708-226-1360*

*14400 S. John Humphrey Drive, Suite 101*

*Fax: 708-226-1657*

*Orland Park, IL 60462*

January 11, 2008

RE: Victoria Jones

To Whom It May Concern:

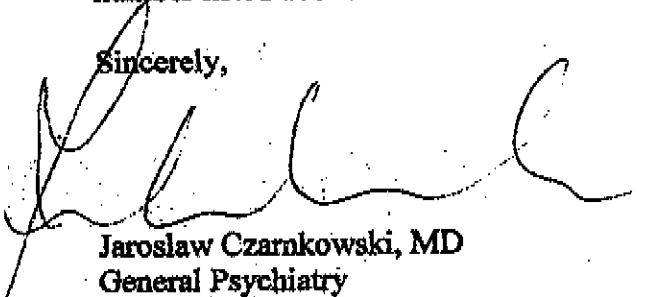
The above named patient Victoria Jones is currently under my care. She has been diagnosed with Major Depressive Disorder, Recurrent 296.3X, Panic Disorder w/o Agoraphobia 300.01.

Mrs. Jones is currently undergoing treatment including medication management and is taking Remeron 30mg one tab qhs, Ambien CR 12.5mg one tab qhs as needed and began Ativan 1mg at bed time.

In my clinical opinion problems at work contributed to her current mental condition.

If you have further questions or concerns please do not hesitate to contact my office at the number listed above.

Sincerely,



Jaroslaw Czarnecki, MD  
General Psychiatry  
Psychosomatic Medicine

JC/ew





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## Residential Special Hardship Fund

Funding Agency:	Southwest CEDA		Contact Person:	Linda Hewitt	
Agency Address:	3513 W. 139th St.		Phone #	1-708-371-1522	
Customer Name:	Victoria Jones		Fax #	1-708-371-1247	
Address:	3242 Kille Rd.				
City:	Rockville	State:	IL	Zip:	60472
Home Phone:	708-846-1777		Other Phone:		
Account Security Number:	831-3-3054	Account Number:	0110123005		
Amount Requested?	Reason for assistance: C.O.R. has a medical condition.				

I hereby release the following information to ComEd and The Illinois Community Action Association (ICAA), its Agents or its Agents. My consent allows personal account information to be shared with ComEd and ICAA for the purpose of providing assistance for my utility service. Note: The program will be terminated once funds are exhausted or rate freeze legislation has passed. Submission of an application does not guarantee the applicant will get a grant. ComEd reserves the right to deny an application for service without notice. One application per household.

Signature:	<i>[Signature]</i>	Date:	4/16/2008
Signature:	<i>[Signature]</i>	Date:	4/26/2008

FOR COMPANY USE DO NOT WRITE BELOW THIS LINE.

ICAA Agent Use Only			
Approved?	YES	DENIAL REASON:	Credit Amount:
	NO		



208 S. LaSalle Street, Suite 2010 • Chicago, Illinois 60604-1001

COOK COUNTY: \_\_\_\_\_

INTAKE SITE: 607APPLICATION DATE: 4/16/08**ZERO INCOME AFFIDAVIT**Victoria Jones

(Applicant Name)

residing at

3242 Kinross Rd. Lillington, IL 60477

attest to the fact that adult members

of my household have received zero income for the period covering 2/17/08 to 4/16/08

Name of adult members with Zero Income:

Victoria Jones referred to DHS

EXPENSE	AMOUNT
Rent	\$ <u>700.00</u>
Food	\$ <u>400.00</u>
Heat	\$ <u>100.00</u>
Electricity	\$ <u>59.00</u>
Water	\$
Transportation	\$
Loans	\$
Miscellaneous	\$
<b>TOTAL</b>	<b>\$ <u>1259.00</u></b>

Last date of employment/ending date of income source: 10/07Date of last paycheck/income received: 10/07

Our family has met the above financial obligations during the reporting period by:

Being Sample from

(\$ amount)

Victoria Jones 708 446-1777

(Name of source/ telephone)

3242 Kinross Rd. Lillington, IL

(Address)

from

(Name of source/ telephone)

(Address)

(\$ amount)

I understand that to perjure myself in order to obtain assistance is a fraudulent offense for which I can be prosecuted.

Signature

Print Name of Applicant

Witnessed By

Date

Social Security

Date

4-16-08331-54-3054